

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

POP TOP CORP.,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Civil Action No. 6:21-cv-00315-ADA

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR ENTRY OF
CONFIDENTIALITY AND PROTECTIVE ORDER**

Amazon.com, Inc. hereby submits an unopposed motion entry of the attached Protective Order. The Protective Order is necessary to preserve and maintain the confidentiality of personal, private, confidential, and/or commercially sensitive information regarding the parties, employees, former employees of the parties, and third parties that might be disclosed during the course of discovery in this litigation. WHEREFORE, the parties respectfully request that the Court grant the Unopposed Motion for Entry of Protective Order and enter the attached Protective Order.

Dated: October 22, 2021

Respectfully submitted,

/s/ Daniel T. Shvodian

M. Craig Tyler, Bar No. 794762
PERKINS COIE LLP
500 W 2nd St, Suite 1900
Austin, TX 78701-4687
Telephone: (737) 256-6113
Facsimile: (737)256-6300

Daniel T. Shvodian, *Admitted Pro Hac Vice*
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
Telephone: (650) 838-4300
Facsimile: (650) 838-4350

Kevin A. Zeck, *Admitted Pro Hac Vice*
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000

W. Matthew Pierce, *Admitted Pro Hac Vice*
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
Facsimile: (206) 359-9000

*Attorneys for Defendant
Amazon.com, Inc.*

CERTIFICATE OF CONFERENCE

I have conferred with counsel for Pop Top Corp., and Plaintiff does not oppose this motion for entry of confidentiality and protective order.

/s/ Daniel T. Shvodian

Daniel T. Shvodian

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on October 22, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Daniel T. Shvodian

/s/ Daniel T. Shvodian